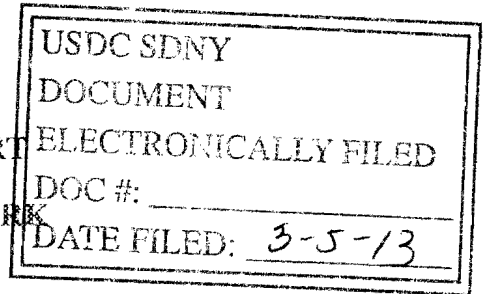


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



MATHEW SCHEETZ, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A., CHASE
INSURANCE AGENCY, INC., and DOES 1-
50 inclusive,

Defendants.

Case No.: 1:12-cv-4113 (PKC)

ECF Case

JOINT STIPULATION AND PROPOSED ORDER TO
STAY CASE PENDING SETTLEMENT

Plaintiff Matthew Scheetz, individually and on behalf of all others similarly situated, ("Plaintiff" or "Scheetz") and Defendants JPMorgan Chase Bank, N.A. and Chase Insurance Agency, Inc. (together "Chase" or "Defendants") (collectively the "Parties") respectfully submit the following Joint Stipulation and Proposed Order to Stay Case Pending Settlement:

WHEREAS, following a series of mediation sessions that finished on February 15, 2013, the Parties have now reached a settlement in principal and term sheet that is in the process of being memorialized in a Confidential Memorandum of Understanding ("MOU");

WHEREAS, while the specific terms of the MOU remain confidential and are subject to diligence and final sign off by authorized representatives of the parties, the pending settlement seeks to resolve all claims on a nation-wide basis with respect to all class members alleged to be

similarly situated in certain lender placed flood insurance cases pending around the nation, including this action;

WHEREAS, the Parties anticipate that due diligence and client approval will not be obtained until after March 6, 2013, the current filing deadline for Plaintiff's opposition to Chase's Motion to Dismiss;

WHEREAS, because the tentative national settlement class will encompass other pending lender placed insurance class actions involving flood insurance pending in venues around the country, the Parties still need to determine the appropriate court from which to seek approval of settlement and release resolving all lender placed flood claims that were, are or could be brought against Chase.

IT IS THEREFORE STIPULATED AND AGREED, AND RESPECTFULLY REQUESTED AS FOLLOWS:

The case shall be stayed until Monday, May 6, 2013. During the period of the stay, the Parties will provide a case management report to the Court on or before Monday, April 15, 2013 to apprise the Court of the status of the settlement approval process. In the unlikely event that preliminary approval of the settlement is denied or the settlement cannot be effectuated, the Parties will notify the Court in writing at least 10 days before the end of the stay.

~~IT IS SO STIPULATED.~~

Dated: March 1, 2013

BINGHAM McCUTCHEN LLP

By:

Peter Obstler

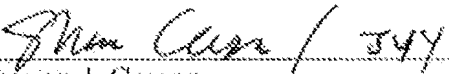
Three Embarcadero Center
San Francisco, CA 94111

PKC
The motion to dismiss (DE # 20) is deemed WITHDRAWN WITHOUT PREJUDICE subject to replying within 30 days of the expiration of the stay. The motion may be renewed by filing a new notice of motion.

Tel: (415) 393-2578
Fax: (415) 262-9244
*Attorneys for Defendants JP Morgan Chase
Bank, N.A. and Chase Insurance Agency, Inc.*

Dated: March 1, 2013

BERGER & MONTAGUE, P.C.

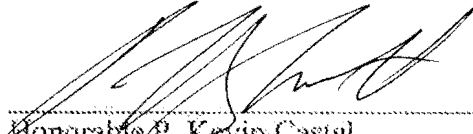
By: 
Shannon J. Carson

1622 Locust Street
Philadelphia, PA 19103
Telephone: (215) 875-4656
Facsimile: (215) 875-4604
scarsen@bm.net

Attorneys for Plaintiff Mathew Scheetz

IT IS SO ORDERED:

Dated: 3-4, 2013


Honorable P. Kevin Castel
United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MATHEW SCHEETZ, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A., CHASE
INSURANCE AGENCY, INC., and DOES 1-
50, inclusive,

Defendants.

Case No.: 1:12-cv-4113 (PKC)

ECF Case

PROOF OF SERVICE

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of San Francisco, State of California, and not a party to the above-entitled case. I certify that I served a copy of the following:

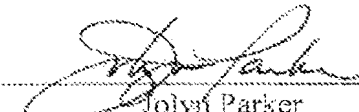
**JOINT STIPULATION AND PROPOSED ORDER TO STAY CASE PENDING
SETTLEMENT**

by causing a true and correct copy of the documents to be delivered by UPS in a sealed envelope with all fees prepaid at the address set forth below:

Donna Siegel Moffa
Trujillo, Rodriguez & Richards, L.L.P.
8 Kings Highway West
Haddonfield, NJ 08033
(856) 795-9002

I declare under penalty of perjury that I am employed in the office of a member of the bar of this Court at whose direction this service was made and that the foregoing is true and correct.

Executed on March 1, 2013, at San Francisco, California.


Tolya Parker